



B A S M A A

Alameda Countywide  
Clean Water Program

Contra Costa  
Clean Water Program

Fairfield-Suisun  
Urban Runoff  
Management Program

Marin County  
Stormwater Pollution  
Prevention Program

San Mateo Countywide  
Stormwater Pollution  
Prevention Program

Santa Clara Valley  
Urban Runoff Pollution  
Prevention Program

Vallejo  
Sanitation and Flood  
Control District

September 6, 2006

Shin-Roei Lee  
Chief – South Bay Watershed Management Division  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay St., Ste. 1400  
Oakland, CA 94612

**Subject: Comments on Unresolved Issues – Municipal Regional Permit  
for Phase I MS4s**

Dear Ms. Lee:

Attached please find comments from BASMAA and its member agencies (to the extent that member agencies have been able to respond in the time period provided) on staff's unresolved issues posted on the Regional Water Board's website. In general, BASMAA and its member agencies found that some of the unresolved issues posted by Regional Water Board staff were as we expected (i.e., unresolved in the MRP work groups), but some posted issues:

- were not unresolved,
- are new and were not raised in the work groups (i.e., can not be unresolved because they were not discussed in the work groups), or
- are vague and unclear, or were stated as directive conclusions.

We also found that staff's unresolved issues posting omitted many issues that we believe have not yet been resolved.

With our submission of these attached general comments/concerns with the posted unresolved issues, please note that failure by us to comment on any issue does not in any way imply consent to or agreement with the process or its content – comments provided are only preliminary comments on issues addressed by staff request.

According to the most recent task list / schedule (5/24/06 – updated by BASMAA 8/26/06), it is our understanding that the next steps will focus on the unresolved issues, including additional opportunity for comments and discussion and at least one or two all-day meetings. As you will see from the attached, BASMAA believes these further communication opportunities to address (or at least narrow differences on) unresolved issues are essential before staff can meaningfully attempt to draft "close to" permit language. Please identify dates for these important meetings and confirm the revised schedule as soon as possible so all stakeholders may plan their schedules for the next few months.

Sincerely,

Geoff Brosseau, Executive Director

cc: BASMAA Executive Board  
Bruce Wolfe, Regional Water Board  
Dale Bowyer, Regional Water Board

Attachments: BASMAA and Member Agency comments on Unresolved Issues  
MRP Revised Schedule & Tasks

Bay Area

Stormwater Management

Agencies Association

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